

1 THE HONORABLE RICHARD A. JONES
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7 UNITED STATES DISTRICT COURT
8 WESTERN DISTRICT OF WASHINGTON
9 AT SEATTLE

10 BLACK LIVES MATTER SEATTLE-
11 KING COUNTY, ABIE EKENEZAR,
12 SHARON SAKAMOTO, MURACO
13 KYASHNA-TOCHA, ALEXANDER
14 WOLDEAB, NATHALIE GRAHAM,
15 AND ALEXANDRA CHEN,

16 Plaintiffs,

v.

CITY OF SEATTLE,

Defendant.

No. 2:20-cv-00887-RAJ

DECLARATION OF CLOIE CHAPMAN IN
SUPPORT OF PLAINTIFFS' MOTION FOR
CONTEMPT

17 I, Cloie Chapman, declare and state as follows:

18 1. The information contained in this declaration is true and correct to the best of my
19 knowledge, and I am of majority age and competent to testify about the matters set forth herein.

20 2. I am a Seattle resident residing in the International District. I have participated in
21 protests against police violence. As a mixed-race Asian American, I feel that it is important to
22 add my voice as an ally to individuals and communities that bear more of the brunt of police
23 violence.

24 3. On July 25, 2020, I joined the protest at Seattle Central College sometime
25 between noon and 1pm. I marched with others, going south on Broadway and then onto Boren

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CHAPMAN DECL. ISO MOT. FOR
CONTEMPT (No. 2:20-cv-00887-RAJ) -1

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1 Avenue, then turning left onto 12th Avenue. During all this time, the march was non-violent and
 2 I heard no sirens and I did not see police officers until we got to 12th and Pine when we came
 3 upon a huge crowd of bike cops.

4. With no warning, the cops began throwing flash bangs and pepper balls at us.
 5 Though I had a mask on, the smoke from the pepper balls made me cough and my skin burned. I
 6 saw a person get hit in the back of the knee with a projectile, and another person, hit in the back.

7. It was around 4pm by now, and the police kept pushing the line, using pepper
 8 balls and there was a lot of white gas or smoke. At previous protests, I had heard warnings, a
 9 notice to move, and dispersal orders. At no time on July 25, 2020, did I hear a warning or
 10 dispersal order.

11. I then heard calls for a medic. Though I don't consider myself to be a medic,
 12 because I'm trained in administering first aid and am CPR certified, I ran toward the calls. I
 13 came upon Joey Wieser in an alley where people had taken him to get him away from the police.
 14 I could see him visibly shaking. His face was red and he couldn't open his eyes. Fortunately,
 15 others came with supplies and flushed his face and eyes with various solutions until, it seemed
 16 like 20 minutes later, he was finally able to open his eyes.

17. I then returned to rejoin other protesters. At one point, I was near the intersection
 18 of Broadway and Pine. The group I was with was sandwiched between two lines of police. I did
 19 not see what weapons the police were using. All I know is that there was lots of gas, lots of
 20 smoke. It felt like my skin was burning. I inhaled gas and it caused burning in my lungs. I could
 21 feel my chest tighten. I began coughing.

22. The group I was with was engaging in non-violent protest. We posed no threat to
 23 anyone. Things were calm before the police began using flash bangs, pepper balls, and other
 24 devices.

9. The next morning, Sunday, July 26, 2020, I had very unusual menstrual bleeding. I have not seen my doctor yet, but I'm deeply worried that this was caused by chemicals in the gas I breathed in. I am worried about long term effects I may suffer.

10. Despite these concerns, I still intend to participate in protests.

Executed this 27th day of July 2020 at Seattle, Washington.

I declare under penalty of perjury under the laws of the United States and the State of Washington that the foregoing is true and correct.

By: 
CLOIE CHAPMAN

**CHAPMAN DECL. ISO MOT. FOR
CONTINUATION (No. 2:20-cv-00887-BAL) - 3**

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